

**SUPPLEMENTATION TO ANSWERS TO INTERROGATORIES
AND RESPONSES TO REQUESTS FOR ADMISSIONS
AND FOR PRODUCTION OF DOCUMENTS**

Owens-Illinois hereby supplements all existing Interrogatory Answers, Responses to Requests for Admissions, and Responses to Requests to Produce Documents previously served in the BALTIMORE CITY Asbestos Litigation to the extent that any such interrogatory, request for admission or document request seeks to elicit information or admissions of the following nature or document related thereto:

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In the course of its continuing investigation, Owens-Illinois has discovered the following documents which may be responsive to previous interrogatories and/or request for documents or admissions and which will be made available for inspection and copying: various brochures, pamphlets and advertisements relating to Kaylo, photographs of Kaylo products, negative listing, and a newsletter by American Structural Products Company. This defendant is unable to verify whether Kaylo was in fact used for all or each of the applications suggested in the advertisements. All of the documents will be made available for inspection and copying at the offices of its counsel in this jurisdiction.

The Kaylo asbestos-containing products manufactured by this defendant were intended to be used for industrial high temperature thermal insulation such as pipe covering and block insulation, and to increase fireproofing and fire protection and for insulation through use as a roof deck or fireproof material or core material used in fire doors and laminated panels. The information available to this defendant indicates that it was contemplated that the core material could be used to manufacture panels which could be laminated with facings of any one of a variety of materials, including wood veneer, aluminum, steel, stainless steel, zinc-coated steel, cement-asbestos, porcelain enamel, plastics and monel and that the core material in fire doors could be laminated with facings of metal or wood veneer.

A subsidiary of Owens-Illinois may have manufactured wood veneer for use as a facing on fire doors and laminated panels and may have assembled such fire doors and laminated panels with the wood veneer. All other facings were manufactured by other companies and assembled by the manufacturers of such fire doors and laminated panels. Although it is unclear based on the information available to this defendant whether fire doors and laminated panels were assembled by this defendant, such information indicates that the other companies were the primary if not the only manufacturers of

laminated panels and fire doors. Based on this defendant's records as well as other information produced in the litigation, such manufacturers of fire doors and laminated panels included Haskelite Manufacturing Company, U.S. Plywood, and Algoma Hardwood.

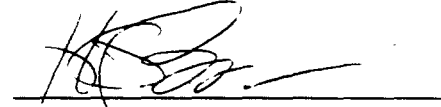
Fire doors were sold by this defendant and by the manufacturers of the fire doors. Laminated panels were used by Owens-Illinois in its own facilities, sold by Owens-Illinois and sold by the manufacturers of the laminated panels. During the period from May 1949, as it relates to laminated panels, and October 1949, as it relates to fire doors, through December 31, 1952, which is the period Owens-Illinois believes that completed fire doors and completed laminated panels were either used or sold by it, the total value of these fire doors, of which the core material was a component, was less than Fifty-four Thousand Dollars (\$54,000) and the total value of these laminated panels, of which the core material was a component, was less than Two Hundred Twenty-four Thousand Dollars (\$224,000).

Owens-Illinois is presently continuing its investigation and will further supplement its discovery responses in the future if it becomes necessary.

Dated: 12/13, 1995.

OWENS-ILLINOIS, INC.

By:


H.G. Bruss

December 13, 1995

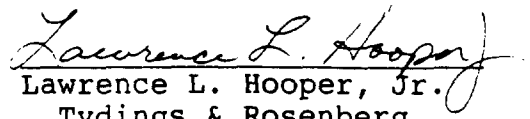
Then personally appeared the above named H.G. Bruss, in his capacity as Assistant Secretary of Owens-Illinois, Inc. and made oath that the foregoing supplementation to Answers to Interrogatories, Responses to Requests for Admissions and for Production of Documents is true to the best of his knowledge, information and belief.

Before me,


Notary Public

MARY JANET CRAWFORD
Notary Public, State of Ohio
My Commission Expires 1-4-96

Respectfully submitted,



Lawrence L. Hooper, Jr.
Tydings & Rosenberg
100 E. Pratt Street
Baltimore, MD 21202
(410) 752-9700

Attorneys for Owens-Illinois,
Inc.

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Responses to Requests for Admissions, and Responses to Requests to Produce Documents previously served in the DISTRICT OF MARYLAND Asbestos Litigation to the extent that any such interrogatory, request for admission or document request seeks to elicit information or admissions of the following nature or document related thereto:

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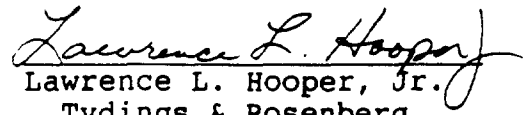
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